

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, DC 20554

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APR 23 2001

In the Matter of )  
 )  
 Amendment of Section 73.202(b) )  
 Table of Allotments, )  
 FM Broadcast Stations. )  
 (Emmetsburg and Sibley, Iowa) )

MM Docket No. 01-65  
 RM-10078

FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

To: Chief, Allocations Branch  
 Policy and Rules Division  
 Mass Media Bureau  
 Attention: **Mail Stop 1800D5**

**COMMENTS AND COUNTERPROPOSAL**

1. Eisert Enterprises, Inc. ("Eisert"), licensee of KDWD(FM) [formerly KEMB(FM)], Channel 261A, Emmetsburg, Iowa, by its attorneys, hereby submits its comments and counterproposal to the above-referenced Notice of Proposed Rule Making (the "NPRM"). As detailed in the NPRM, the Commission proposes to amend the Table of Allotments, FM Broadcast Stations, as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Emmetsburg, IA	261A	261C3
Sibley, IA	262A; 282A	282A

2. In lieu of the deletion of Channel 262A at Sibley, Eisert hereby counter proposes that Channel 264A be substituted for Channel 262A at Sibley and the channel re-allotted to Sanborn, Iowa, as that community's first local service.<sup>1</sup> Channel 264A at Sanborn would be mutually

<sup>1</sup> The FM priorities are (1) first aural service, (2) second aural service, (3) first local service, and (4) other public interest matters. *Revision of FM Assignment Policies*, 90 FCC 2d 88, 92 (1982) ("*FM Assignments*"). The second and third priorities are given equal weight. *Id.*

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exclusive with the current allotment of Channel 262A at Sibley; therefore, this proposal may be made as a counterproposal in this proceeding (as opposed to a proposal for a new allotment in a new proceeding). If the Commission substitutes Channel 264A for Channel 262A at Sibley and re-allots the channel to Sanborn, Eisert pledges to promptly file an application to construct a station on Channel 264A at Sanborn and promptly construct the station upon grant of the application.

3. Eisert again requests that it be allowed to upgrade KDWD from a Class A to a Class C3 station. If the Commission upgrades the Channel 261 allotment in Emmetsburg from a Class A to a Class C3, Eisert pledges to promptly file an application to upgrade KDWD and promptly upgrade the station's facilities upon grant of the application.

4. Pursuant to this counterproposal, Eisert hereby petitions the Commission to amend the Table of Allotments, FM Broadcast Stations, as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Emmetsburg, IA	261A	261C3 <sup>2</sup>
Sibley, IA	262A; 282A	282A
Sanborn, IA	-	264A

5. Upgrade of Emmetsburg Station. As detailed in the Technical Statement, attached hereto as **Exhibit I**, and Eisert's Petition for Rule Making, grant of the proposal to upgrade KDWD from a Class A to a Class C3 will allow Eisert to substantially increase the size and population of KDWD's service area. Specifically, KDWD currently provides 60 dBu service to

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<sup>2</sup> Since the proposed new allotment is mutually exclusive with the existing allotment, no competing expressions of interest in the new channel may be accepted; and if the new channel is allotted, it may be occupied only by KDWD.

an area of 2,466 square kilometers containing 24,862 persons. If Eisert's proposal is adopted, and KDWD upgrades from a Class A to a Class C3, it will provide 60 dBu service to an area of 4,536 square kilometers containing 49,055 persons – an increase of 24,193 persons spread over 2,070 square kilometers. This proposal does not effect an urbanized area.

6. Eisert's proposal involves a change in class of channel for KDWD, from 261A to 261C3. Operation of KDWD from Channel 261C3 will continue to allow KDWD to place a city grade signal over Emmetsburg, Iowa, KDWD's community of license. As detailed in the attached Technical Statement, this reference point is fully spaced to all domestic allocations and operating stations, except for the mutual exclusivity to KDWD's current Class A operation and the now vacant Class A allotment on Channel 262 at Sibley, Iowa.

7. Substitution of Channel 264A for Channel 262A and Re-allotment to Sanborn, IA. The 262A allotment at Sibley was made more than 13 years ago. After the 262A allotment remained unoccupied for seven years, 21st Century Radio Ventures, Inc. ("21st Century") applied for and received a permit to construct a station on Channel 262A. *See* BPH-19930809MA. However, 21st Century failed to construct the station during the six years it held the permit, and the permit automatically expired on December 21, 2000.<sup>3</sup> *See id.* Apparently, 21st Century determined that it was not cost effective to construct on Channel 262A and unsuccessfully petitioned the Commission to upgrade the channel to a Class C3. *See Sibley, Iowa, and Brandon, South Dakota*, MM Docket No. 96-66, 13 CC Rcd 22209 (1998), *aff'd*, DA 00-2226 (September 29, 2000).

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<sup>3</sup> Eisert is not serving 21st Century with the instant pleading, nor did it serve 21st Century with the Petition for Rule Making, since 21st Century's construction permit for Channel 262A expired. *Cf.* 47 C.F.R. § 1.401(d) (requiring a petitioner to serve any licensee whose channel assignment would be changed by grant of the petition).

8. The failure of any party to show an interest in Channel 262A for the first seven years after it was allotted to Sibley, and the failure of 21st Century to construct a station on Channel 262A during the six years it held a construction permit to do so, clearly demonstrate a lack of interest in that channel.<sup>4</sup>

9. It should be noted that if there is any interest in operating an FM station in Sibley, that interest would not be thwarted by Eisert's initial proposal or counterproposal, since Sibley has a second channel, Channel 282A, that has remained vacant since it was allotted. *See Sibley, Iowa*, MM Docket 98-219, RM-9390, 64 FR 41830 (1999).<sup>5</sup> The Commission intends to auction a construction permit for Channel 282A at Sibley during Auction No. 37. *See Auction for FM Broadcast Construction Permits Postponed Until December 5, 2001*, DA 01-619 (March 7, 2001). Thus, any entity that wants to provide Sibley with service may do so if it is the highest bidder for the Sibley construction permit during Auction No. 37.

10. Sanborn Qualifies as an Independent Community for Allotment Purposes. Generally, Section 307(b) of the Communications Act of 1934, as amended, requires that channel allotments be made to communities with geographically identifiable population groupings. *See FM Assignments, supra*, 90 FCC 2d at 101 (noting that if a community is incorporated or listed in the U.S. Census, it qualifies as an independent community for allotment purposes).

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<sup>4</sup> As Eisert noted in its Petition for Rule Making, such lack of interest provided strong support for Eisert's initial proposal to delete Channel 262A at Sibley. *See Florence and Comobabi, Arizona*, MM Docket No. 00-107, RM-9891, DA 00-2773 (December 8, 2000) (deleting vacant Channel 275A, Comobabi, Arizona, without replacement after the channel was allotted 15 years ago and no expression of interest in retaining a Class A channel allotment at Comobabi was received).

<sup>5</sup> 21st Century is the entity that proposed allotting Channel 282A at Sibley.

11. Sanborn, Iowa is an incorporated community of 1,345 persons located in the northwestern portion of O'Brien County, Iowa.<sup>6</sup> According to the "Community Quick Reference" produced by the Iowa Department of Economic Development, attached hereto as **Exhibit II**, and information received from the Sanborn community officials, Sanborn is governed by an elected mayor and city council. The Sanborn Electric and Telecommunications Board of Trustees helps regulate the community's own municipal utilities. Sanborn also has a City Hall, schools, eight churches, a large medical facility, a 25-member volunteer fire department, civic organizations, a wide-range of recreational facilities, and numerous retail and wholesale businesses and industrial complexes. Finally, Sanborn is at the junction of two well-traveled highways, U.S. Routes 18 and 59.

12. The Commission has long held that providing a community with its first local service is one of the top priorities of its FM allotment policy. *FM Assignments, supra*, 90 FCC 2d at 92. Sanborn has no local FM service despite the fact that it clearly qualifies as a community for allotment purposes. Sibley, on the other hand, has two FM channels allotted to its community. Channel 282A at Sibley will be auctioned at the upcoming Auction No. 37. And Channel 262A at Sibley has laid fallow since it was allotted to the community 13 years ago, as discussed above. The substitution of Channel 262A with Channel 264A and the re-allotment of the channel from Sibley to Sanborn would further the Commission's FM allotment policy goal of providing a first local service to Sanborn.

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<sup>6</sup> 1990 U.S. Census. The estimated 2000 population of Sanborn is 1,500 persons.

13. In addition to furthering the Commission's FM allotment priorities, the allotment of Channel 264A to Sanborn is consistent with the Commission's rules regarding spacing among FM broadcast stations. As demonstrated in the attached Technical Statement, the allotment of Channel 264A to Sanborn would not create short-spacing problems with any existing or allotted stations.

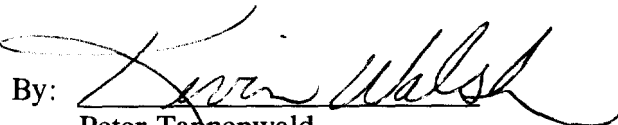
14. Eisert has demonstrated that: (a) the upgrade of KDWD from a Class A to a Class C3 will provide Emmetsburg with its first expanded service, allowing KDWD to provide 60 dBu service to 49,055 persons – approximately twice as many persons as it now serves; (b) Channel 262A at Sibley has laid fallow for 13 years; (c) Channel 282A at Sibley will be auctioned during Auction No. 37; (d) Sanborn is a community for allotment purposes; (e) the substitution of Channel 264A for Channel 262A at Sibley and the re-allotment of the channel to Sanborn would provide Sanborn with its first local service; and (f) the allotment of Channel 264A at Sanborn would not violate the Commission's minimum-spacing requirements among FM broadcast station.

15. Eisert pledges to promptly file an application to upgrade KDWD from a Class A to a Class C3 station to serve Emmetsburg and promptly apply for Channel 264A if it is allotted to Sanborn and promptly construct the station if its application is granted.

16. WHEREFORE, the premises considered, Eisert respectfully requests that the Commission amend the Table of Allotments, FM Broadcast Stations, as detailed above.

Respectfully submitted,

EISERT ENTERPRISES, INC.

By:   
Peter Tannenwald  
Kevin M. Walsh  
~~Its Attorneys~~

IRWIN, CAMPBELL & TANNENWALD, P.C.  
1730 Rhode Island Avenue, NW, Suite 200  
Washington, DC 20036  
(202) 728-0400

April 23, 2001

kmw/50150p.002.COM

## **EXHIBIT I**

*See attached Technical Statement.*



# GRAHAM BROCK, INC.

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BROADCAST TECHNICAL CONSULTANTS

## **COMMENTS AND COUNTERPROPOSAL**

**MM DOCKET # 01-65**

**EISERT ENTERPRISES, INC.**

**ALLOT CHANNEL 261C3**

**EMMETSBURG, IOWA**

**April 2001**

## **TECHNICAL EXHIBIT**

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**COMMENTS AND COUNTERPROPOSAL**  
**MM DOCKET # 01-65**  
**EISERT ENTERPRISES, INC.**  
**ALLOT CHANNEL 261C3**  
**EMMETSBURG, IOWA**  
**April 2001**

**TECHNICAL STATEMENT**

This technical statement and attached exhibits were prepared on behalf of Eisert Enterprises, Inc. ("EEI"), licensee of station KDWD (formerly KEMB), Channel 261A, Emmetsburg, Iowa. EEI is also the petitioner in MM Docket #01-65, seeking to upgrade KDWD to Channel 261C3 at Emmetsburg. As denoted in the petition, in order to upgrade KDWD, Channel 262A, presently allotted to Sibley, Iowa, has to be deleted. In lieu of the deletion of the channel at Sibley, EEI herein proposes that Channel 264A be substituted for Channel 262A at Sibley and the channel re-allotted to Sanborn, Iowa, as that community's first locally licensable FM service.<sup>1</sup>

**DISCUSSION**

Sanborn is an incorporated community of 1,345 persons located in the northern portion of O'Brien County, Iowa.<sup>2</sup> Sanborn is governed by a Mayor and City Council. The city provides water, sewer and electricity to its residents. Sanborn also provides police protection and has a volunteer fire department. There are numerous businesses, churches and civic organizations active in Sanborn.

**PROPOSAL**

Channel 264A can be allotted to Sanborn, Iowa, at reference coordinates North Latitude 43° 10' 53" and West Longitude 95° 39' 23", without the imposition of a site restriction. Exhibit

- 
- 1) Channel 264A cannot be allotted to Sibley due to an excessive site restriction which would prevent city grade coverage over the community.
  - 2) Population 1990 census data. The estimated 2000 population of Sanborn is 1,500 persons.

#1 is a usable area map showing where a transmitter site for Channel 264A at Sanborn can be located. Exhibit #2 is a §73.207 spacing analysis showing Channel 264A meets the Commission's minimum distance separation requirements to all licensed, applied for or proposed facilities. From the proposed allotment site, a 3.16 mV/m contour will be delivered over Sanborn. The proposed allotment is not mutually exclusive with the proposed Emmetsburg upgrade request.

Therefore, EEI proposes the following changes to the Commission's Table of FM Allotments:

**Emmetsburg, Iowa**

<u>Present</u> 261A	<u>Proposed</u> 261C3
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**Sibley, Iowa**

<u>Present</u> 262A, 282A	<u>Proposed</u> 282A
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**Sanborn, Iowa**

<u>Present</u> None	<u>Proposed</u> 264A
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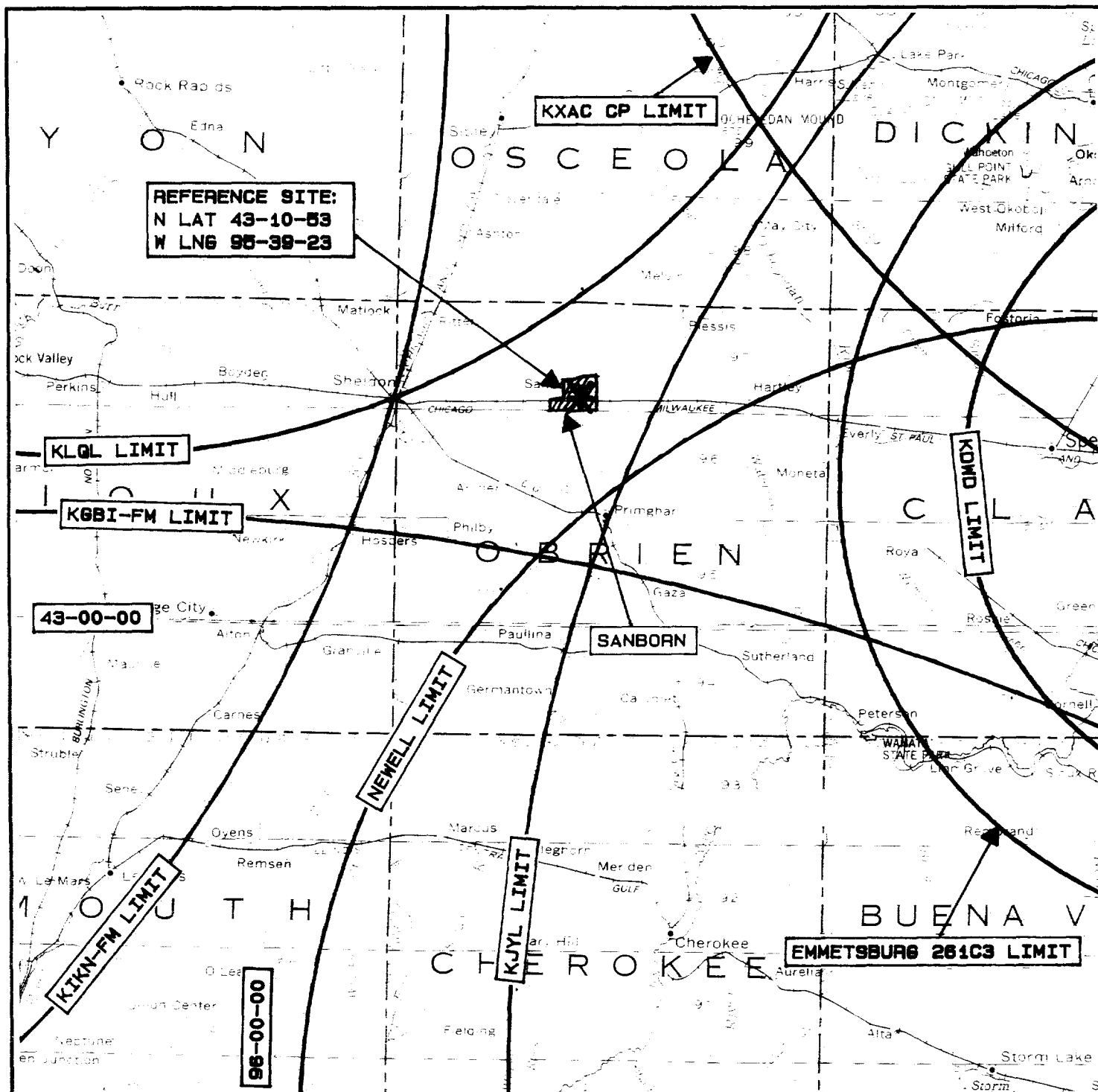
**PUBLIC INTERESTS**

As detailed in the original petition, the upgrade of KDWD will provide Emmetsburg with its first expanded service, allowing KDWD to provide 60 dBu service to 49,055 persons. Further, the change in channels at Sibley and re-allotment of Channel 264A to Sanborn, Iowa,

will provide the first locally licensable service to a new community. A maximum Class A at Sanborn will provide 60 dBu service to 25,032 persons in 2,516.1 square kilometers.

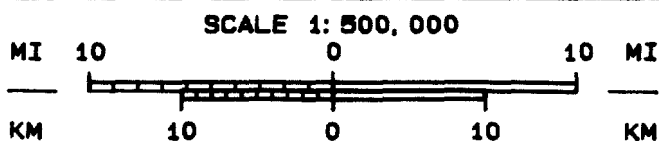
The re-allotment of the channel from Sibley will not deprive Sibley of potential service. At present, both Channel 262A and Channel 282A are allotted to Sibley (and are both vacant allotments). Channel 282A will remain in Sibley following adoption of this instant proposal. Any party interested in an FM facility in Sibley can participate in the upcoming auction process, seeking authority to operate on Channel 282A at Sibley. Once Channel 261C3 is allotted to Emmetsburg, EEI will submit an application to implement the expanded service. Further, EEI will submit the necessary form to indicate its interest in a new FM channel at Sanborn, Iowa.

The foregoing technical statement was prepared on behalf of Eisert Enterprises, Inc., by Graham Brock, Inc. its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data related to FM allotments and stations was extracted from the CDBS database, as updated on April 6, 2001. We assume no liability for errors or omissions in that database which may be adverse to the requests contained herein.



## USABLE AREA MAP

MAP IS A PORTION OF THE 1: 500, 000 SCALE  
U.S.G.S. BASE STATE MAP OF IOWA.



## EXHIBIT #1

COMMENTS & COUNTERPROPOSAL  
MM DOCKET #01-65  
EISERT ENTERPRISES, INC.  
ALLOT CHANNEL 261C3  
EMMETSBURG, IOWA

**Apr 11 2001**

GRAHAM BROCK, INC.

## BROADCAST TECHNICAL CONSULTANTS

**COMMENTS AND COUNTERPROPOSAL**  
**MM DOCKET # 01-65**  
**EISERT ENTERPRISES, INC.**  
**ALLOT CHANNEL 261C3**  
**EMMETSBURG, IOWA**  
**April 2001**

**EXHIBIT #2**

ALLOCATION STUDY FOR SANBORN, IOWA  
 USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS A	DISPLAY DATES
43 10 53 N		DATA 04-06-01
95 39 23 W	Current rules spacings	SEARCH 04-09-01
----- CHANNEL 264 -100.7 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD264	264A	Sanborn	IA	0.0	0.00	115.0	-115.00
AD	43 10 53	95 39 23	0.000 kW	0M	0.0	71.5	
> alternative Channel proposal							
RDEL	262A	Sibley	IA	343.4	25.55	31.0	-5.45
DEL	43 24 06	95 44 48	0.000 kW	0M	15.9	19.3	
RM-8729							
KJYL	264C3	Eagle Grove	IA	112.8	148.10	142.0	6.10
LIC CN	42 39 18	93 59 24	25.000 kW	100M	92.0	88.3	
Minn-Iowa Christian Broadcast				BLH-19940310KC			
KLQL	266C1	Luverne	MN	327.6	82.49	75.0	7.49
LIC CN	43 48 24	96 12 23	100.000 kW	162M	51.3	46.6	
Three Eagles Of Luverne, Inc.				BLH-19830822AA			
ALLO	265A	Newell	IA	143.4	80.19	72.0	8.19
VAC	42 36 04	95 04 21	0.000 kW	0M	49.8	44.8	
RM							
KGBIFM	264C	Omaha	NE	190.8	240.56	226.0	14.56
LIC CN	41 03 10	96 11 35	100.000 kW	354M	149.5	140.5	
Grace University				BLH-19900612KB			
KIKNFM	263C1	Salem	SD	283.9	148.83	133.0	15.83
LIC CN	43 29 18	97 26 34	100.000 kW	287M	92.5	82.7	
Southern Minnesota B/cng. Com				BLH-19931019KD			
RADD	261C3	Emmetsburg	IA	95.4	65.26	42.0	23.26
ADD	43 07 24	94 51 29	0.000 kW	0M	40.6	26.1	
RM-10078							
KXAC	263C2	St. James	MN	49.6	133.31	106.0	27.31
LIC C	43 57 03	94 23 25	34.000 kW	180M	82.8	65.9	
Minnesota Valley Broadcasting				BLH-19990402KE			
KXAC.C	263C2	St. James	MN	49.6	133.31	106.0	27.31
CP CN	43 57 03	94 23 25	34.000 kW	180M	82.8	65.9	
Minnesota Valley Broadcasting				BMPH-19990402ID			
KDWD	261A	Emmetsburg	IA	95.4	65.26	31.0	34.26
LIC CN	43 07 24	94 51 29	3.900 kW	125M	40.6	19.3	
Eisert Enterprises, Inc.				BLH-19980917KC			

Note: This proposal is to change the channel at Sibley, Iowa, and re-allot the channel to Sanborn. As can be seen, Channel 264A at Sanborn is mutually exclusive with the present Channel 262A allotment at Sibley.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

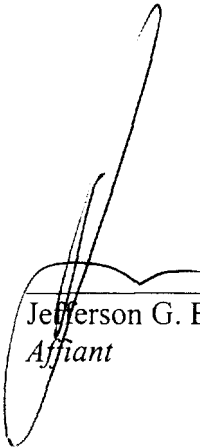
*State of Georgia    )*  
*St. Simons Island    ) ss:*  
*County of Glynn    )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Eisert Enterprises, Inc., licensee of Radio Station KDWD, to prepare the attached Technical Exhibit.


His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 10th day of April, 2001.*

  
\_\_\_\_\_  
Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me  
this the 10th day of April, 2001.*

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: April 20, 2002

## **EXHIBIT II**

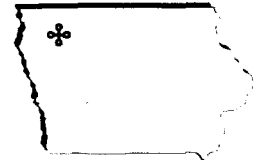
*See attached Community Quick Reference.*



# COMMUNITY QUICK REFERENCE

IOWA DEPARTMENT OF ECONOMIC DEVELOPMENT  
200 East Grand Avenue • Des Moines, Iowa 50309  
(800) 245-IOWA • FAX: (515) 242-4749  
<http://www.smart.state.ia.us>

## Sanborn O'Brien County



### Local Contacts

Economic Development: Jim Zeutenhorst, City Administrator  
City of Sanborn  
102 Main Street; P.O. Box 548  
Sanborn, IA 51248  
**Business: 712-729-3842 FAX: 712-729-3745**

Community Development: Charles Schroek, President  
Sanborn Improvement Association  
P.O. Box 484  
Sanborn, IA 51248 Home: 712-729-3801  
**Business: 712-729-3252 FAX: 712-729-5024**

### Population

(U.S. CENSUS/WOODS & POOLE)

Year	Community	County	State
1980	1,398	16,972	2,913,808
1990	1,345	15,444	2,776,755
2000	1,500	15,600	2,888,600

Population within 50 miles (Comm. Est.): ..... 154,511

### Labor Force Information

IWD Labor Force Summary for: ..... O'Brien County  
Annual Average for: ..... 1997

#### Place of Residence

Resident labor force: .....	7,990
Resident unemployed: .....	190
Percent unemployed: .....	2.4
Resident total employment: .....	7,800

#### Place of Work

Nonagricultural wage and salary workers: .....	6,290
Manufacturing: .....	790
Nonmanufacturing: .....	5,500
Construction and Mining: .....	240
Transportation, Communication and Public Utilities: .....	290
Wholesale and Retail Trade: .....	1,750
Wholesale Trade: .....	550
Retail Trade: .....	1,200
Finance, Insurance, Real Estate: .....	260
Services: .....	1,800
Government: .....	1,170

#### IWD Labor Survey (Labor Force Available):

Male ..... 489 Female ..... 528 Total ..... 1017

### Proximity to Markets

City	Miles	DAYS BY RAILROAD (Carload)	DAYS BY MOTOR FREIGHT (Truckload)
Atlanta	1160	7	3
Chicago	527	4	1
Denver	500	2	2
Des Moines	185	2	1
Kansas City	327	5	1
Los Angeles	1694	8	5
Milwaukee	615	5	1
Minneapolis	190	3	1
New Orleans	1210	7	2
New York	1359	8	4
Omaha	158	2	1
St. Louis	670	4	1

### Wage Rates

For persons in selected occupations living or working in community:

Occupation or Job Title	Hourly Wage Rates	
	Entry	Average
Clerk, General Office	\$ 6.25	\$ 7.50
General Laborer	6.25	8.00
Production Assembler	7.50	10.00
Secretary	6.00	7.00
Mechanic, Auto	5.50	8.61
Production Clerk	7.50	8.25
Production Supervisor	8.00	10.00

January 1999

## Industrial Sites

Site Name	Sanborn SIDS
Total Acreage Available	45
Location of Site	Southeast Sanborn
Asking Price Per Acre	\$5,000 per acre
Name of Landowner	City of Sanborn
Is site served by rail?	Yes
Electricity (Primary Voltage)	12470
Water	10" main
Gas	2" main
Sewer	8" main
Zoning Classification	Commercial
Fire Insurance Class	9
Tax Rate/\$1,000 Assessed Valuation	\$18.57
Is site located within a tax increment area?	Yes
Community willing to create tax incentives?	Yes

Additional site information available upon request. Prices listed above may be subject to negotiation.

## Local Employers

### Major manufacturers and other employers in area

Name	Product/Service	Employment	Union
A.M.P.I.	food processing (cheese)	63	none
Sanborn Co-op Grain	grain terminal	15	none
Prairie View	Independent living/nursing/Alzheimers	98	none
Prins Insurance, Incorporated	insurance agency	17	none

Number of manufacturing plants in community . . . . . 1

Number of manufacturing plants with unions . . . . . 0

Number of manufacturing employees in community . . . . . 80

Number of work stoppages in last five years . . . . . 0

## Utilities

### Electricity

Supplier: .....municipal  
Name of supplier: .....Sanborn Municipal Light Plant

### Water

Water supplied by: .....municipal  
Names of supplier: .....City of Sanborn  
Source of city water: .....well  
Elevated storage capacity: .....65,000 gallons  
Capacity of water plant: .....864,000 gallons  
Average consumption: .....200,000 gpd  
Peak consumption: .....300,000 gpd

### Natural Gas

Name of local distributor: .....City of Sanborn  
Pipeline source: .....Northern Natural Gas Company/ENRON

### Sanitation

Type sewage treatment plant: .....tertiary  
Percent of community served by sewer: .....99%  
Average load .....300,000 gpd  
Peak load .....500,000 gpd  
Design capacity .....500,000 gpd

## Telecommunications

Local telephone company: .....Northern Iowa Tel. Co.  
Time required for repair (reg. bus. hours): .....24 hour service  
Equal access long distance for Intra-LATA calls? .....Yes  
Equal access long distance for Inter-LATA calls? .....Yes  
Type of central office switcher: .....Digital  
Is fiber currently in the ground? .....Yes  
Fiber is used for: .....Toll transport, Hi-cap leases/CATV transport  
Is SS7 service available? .....No  
Is ISDN service available? .....No  
Is T1-DS1 service available? .....Yes  
Is local cellular service available? .....Yes  
Is local Internet service available? .....Yes  
Is local video conferencing service available? .....No

## Tax Structure

Assessed value of property in city: .....\$33,602,754  
Tax rate per \$1,000 assessed value: .....\$30.50  
Bonded indebtedness: City: .....\$755,000  
Bonded indebtedness: School: .....\$0.00  
Bonded indebtedness capacity of community .....\$0.00  
Future indebtedness plans .....\$500,000

## Transportation Services

### Air Service

Time in minutes to nearest public airport: .....30  
Type of runway: .....concrete  
Length of runway: .....2800 feet  
Unicom radio: .....Yes  
Instrument landing system: .....No  
VOR: .....Yes  
Non-directional beacon: .....Yes  
Time in minutes to nearest commercial air service: 65  
City name: .....Sioux City  
Airlines serving point: TWA, United, NorthwestAirlink, TransWorld Express, United Express, and USAir Express.

### Motor Carrier

Number U.S. highways serving city: .....2  
Number Iowa highways serving city: .....0  
Time in minutes to nearest interstate interchange .....30  
Interstate number: .....I-90  
Time in minutes to nearest four-lane highway: .....0  
Highway number: .....US  
Number motor freight carriers serving community: .....1  
Number of local terminals: .....1  
Number of intrastate carriers: .....1  
Number of interstate carriers: .....1

### Rail Service

Community served by railroad: .....Yes  
Frequency of switching service: .....daily  
Piggyback ramp available locally: .....Yes  
Distance in minutes to nearest piggyback service: .....1  
Name of railroad: I&M Rail Link

## Municipal Services

Type of local government: .....Council, Mayor  
City zoning ordinance in effect: .....Yes  
County zoning ordinance in effect: .....No  
Subdivision ordinance with design standards in effect: .....Yes  
Number full-time fire department personnel: .....0  
Number volunteer fire department personnel: .....25  
Fire insurance class in city .....9  
Fire insurance class outside city .....10  
Number of full-time city police officers: .....2  
Industrial waste pickup service: .....Yes  
Percentage of city streets paved: .....99%

## Commercial/Industrial Services

Number of machine shops in community: . . . . . 1  
Minutes to nearest if none in community: . . . . . 0  
Number of tool/die shops in community: . . . . . 1  
Minutes to nearest if none in community: . . . . . 12  
Number of electric motor repair shops in community: . . . . . 1  
Minutes to nearest if none in community: . . . . . 0  
Daily newspaper: . . . . . none  
Weekly newspaper: . . . . . Sanborn Pioneer  
Seating capacity of largest banquet room: . . . . . 250  
Is city served by cable TV? . . . . . Yes  
Number of motels/hotels: . . . . . 1  
Total number of rooms available: . . . . . 10  
Number of financial institutions in city: . . . . . 2  
Number affiliated with a bank chain: . . . . . 1  
Number of company-owned, national chain retail stores: . . . . . 0  
Chamber of Commerce: . . . . . Yes  
Manager is full-time: . . . . . No  
Is community CEPP certified? . . . . . No

## Education

School District: Hartley-Melvin-Sanborn

Type	No.	Teachers	Enrollment	Grades
Elementary	2	34	519	K-6
Middle/Jr. High	1	10	124	7-9
High School	1	21	245	10-12
Private	1	9	88	K-8

Community College and Trade/Technical Schools: Northwest Iowa Community College

Four-year College or University:

Remarks: Five colleges within 35 miles. Northwest Iowa Technical College (10 mi. West) has an excellent electronics program and offers specific industrial training and/or retraining.

## Dependent Care

Kids Express Daycare Center (Fully Licensed), 308 W. 1st Street, Sanborn.

## Climate

Average winter temperature: . . . . . 18.3 degrees  
Average summer temperature: . . . . . 71.2 degrees  
Average annual rainfall: . . . . . 27.5 inches  
Average annual snowfall: . . . . . 33.4 inches

## Cultural & Recreational Facilities

Number of local facilities and those within 1/2 hour drive:  
18 public golf courses . . . . . 37 public parks  
33 public tennis courts . . . . . 29 public swimming pools  
Number of country clubs available: . . . . . 7  
Public access to lake or river: . . . . . Yes  
Activities allowed:  
swimming . . . . . Yes water skiing . . . . . Yes  
fishing . . . . . Yes motor boating . . . . . Yes

## Cultural and Information Resources

theatre . . . . . Yes	historic site . . . . . Yes
library . . . . . Yes	art gallery . . . . . No
opera . . . . . No	symphony . . . . . No
museum . . . . . Yes	historical society . . . . . Yes
ballet . . . . . No	art council . . . . . No

Remarks: Iowa's Great Lakes, (45 minutes away) offer camping, fishing, boating, skiing and much more. Miller Park Complex (1982) is made up of golf, softball, tennis, playground, 2 mile walking trail and indoor/outdoor picnic facilities.

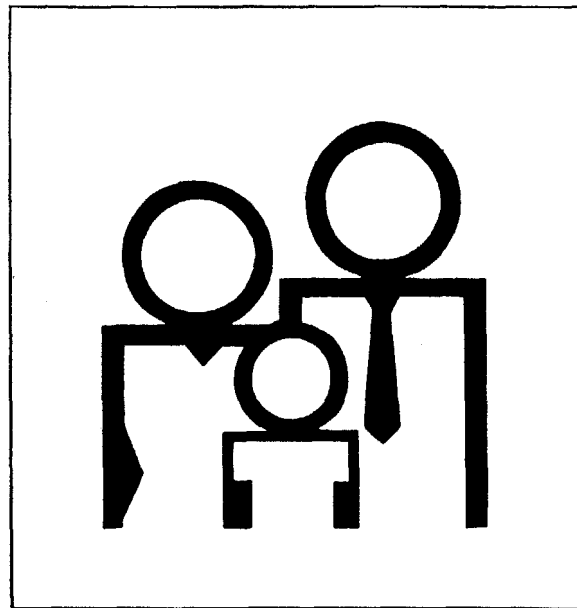
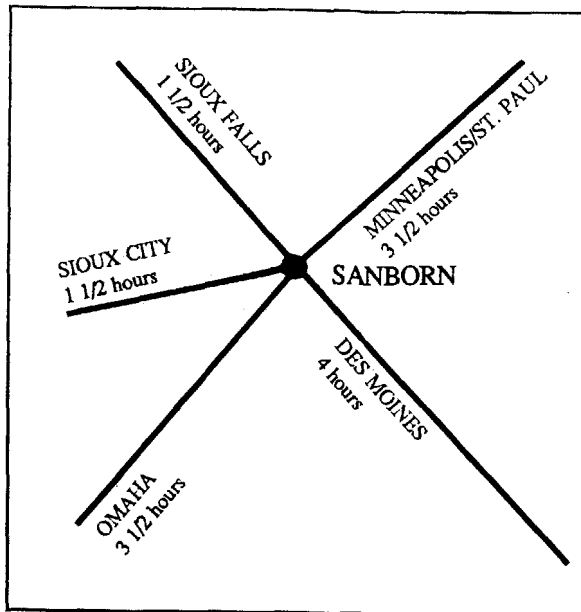
## Health Facilities

Number of hospitals within one hour drive: . . . . . 3  
Total number of beds: . . . . . 184  
Time in minutes to nearest facility: . . . . . 8  
Time in minutes to emergency medical treatment: . . . . . 0  
Is air flight/EMT ambulance service available: . . . . . Yes  
Number of clinics in community: . . . . . 1  
Specialty of clinic: . . . . . General/Family Practice  
Number of medical personnel in county:  
MDs . . . . . 8 DOs . . . . . 0  
Dentists . . . . . 7 DCs . . . . . 8  
Other . . . . . 4

Remarks: Prairie View Retirement Home is considered one of the finest facilities in the region. Three hospitals within 10 miles. Local ambulance provides EMT-D(defibrillator) service.

## Miscellaneous Information

Total number of religious congregations in city: . . . . . 8  
Protestant: 7 Catholic: 1 Jewish: 0 Other: 0  
Average cost of construction for housing: \$80 s.f.



### **SANBORN IS LOCATED**

At the junction of two major U.S. highway routes

Within thirty minutes drive of the Interstate highway system

Less than an hour's drive from the Iowa Great Lakes, the Midwest's most popular boating, fishing and resort area

Twenty-five miles from a regional airport with commuter service, and less than ten miles from three smaller airports

Within an hour's drive from four private colleges and three community colleges

### **SANBORN PROVIDES**

People with a strong work ethic and high productivity

Low-cost utility service provided by our municipally-owned electric, gas, water, sewer, solid waste and cable television systems. Local control of all these utilities has helped make Sanborn an inexpensive place to live and do business

Community support to business and industry through the Chamber of Commerce, City Council, and the Sanborn Improvement Corporation

State and local loans, grants and other financial assistance

### **SANBORN'S LOCATION OFFERS**

Outstanding park and recreation facilities, including a fully irrigated nine-hole golf course, two-mile surfaced jogging/biking trail, heated pool, and more than 30 acres of parks

Reasonably priced housing and commercial space with low tax rates

Local health care professionals, as well as police, fire, rescue and ambulance teams

Good schools and libraries

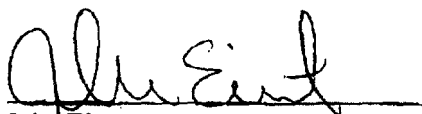
A rural lifestyle within easy reach of metropolitan areas

### DECLARATION OF JOHN EISERT

I, John Eisert, hereby declares as follows:

1. I am the President of Eisert Enterprises, Inc. ("Eisert"), licensee of KDWD(FM), Emmetsburg, Iowa.
2. I have reviewed the foregoing "Comments and Counterproposal" and the facts set forth therein are true and correct to the best of my information, knowledge, and belief.
3. If the Commission upgrades the Channel 261 allotment in Emmetsburg from a Class A to a Class C3, Eisert will promptly file an application to upgrade KDWD and promptly upgrade the station's facilities upon grant of the application.
4. If the Commission substitutes Channel 264A for Channel 262A at Sibley, Iowa and re-allots the channel to Sanborn, Iowa, Eisert will promptly file an application to construct a station on Channel 264A at Sanborn and promptly construct the station upon grant of the application.

I declare under the penalty of perjury that the foregoing is true and correct.



John Eisert  
President  
Eisert Enterprises, Inc.

April 23, 2001

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